

# Exhibit 2

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Wednesday, August 21, 2024 at 09:13:09 Central Daylight Time

**Subject:** Re: Couvillion v. White Marlin: Issues You Have Ignored  
**Date:** Tuesday, August 20, 2024 at 12:45:04 PM Central Daylight Time  
**From:** Jeb Golinkin  
**To:** Schwank, Daniel  
**CC:** Michael Cancienne, Denny, Danica, Eason, Suzanne  
**Attachments:** image001.png, image002.jpg

I will try, but the month between the second week of September and mid-October are going to be very, very tough with my schedule. That said, I'll do the best I can and get back to you.

On that note, please reconsider your refusal to present Holvey and MD for their scheduled depositions next week. They remain on my schedule. They are fact witness depositions totally unrelated to our dispute re. 30(b)(6). We need to knock these things out so we have the remaining months and openings available for the remaining depositions.

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**Joseph W. Golinkin II**  
Trial Attorney | Jordan, Lynch & Cancienne PLLC  
(o) 713-955-4019 | (c) 832-250-6567  
1980 Post Oak Blvd., Suite 2300 Houston, Texas 77056  
[www.jlcfirm.com](http://www.jlcfirm.com) | [Attorney Biography](#)

JL&C

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**From:** "Schwank, Daniel" <DSchwank@frilot.com>  
**Date:** Tuesday, August 20, 2024 at 12:26 PM  
**To:** Jeb Golinkin <jgolinkin@jlcfirm.com>  
**Cc:** Michael Cancienne <mcancienne@jlcfirm.com>, "Denny, Danica" <DDenny@frilot.com>, "Eason, Suzanne" <Season@frilot.com>  
**Subject:** RE: Couvillion v. White Marlin: Issues You Have Ignored

Jeb,

We need to take Nigel's deposition in-person after receiving Defendants' supplemental documents and having an opportunity for our expert to review. Please provide dates for his deposition in mid to late September.

Thanks,  
Daniel



**Daniel E. Schwank (he/him)**  
1100 Poydras Street, Suite 3700  
New Orleans, LA 70163  
504.599.8247 office  
504.599.8137 fax

**From:** Jeb Golinkin <jgolinkin@jlcfirm.com>  
**Sent:** Monday, August 19, 2024 6:07 PM  
**To:** Schwank, Daniel <DSchwank@frilot.com>  
**Cc:** Michael Cancienne <mcancienne@jlcfirm.com>; Denny, Danica <DDenny@frilot.com>; Eason, Suzanne <Season@frilot.com>  
**Subject:** Re: Couvillion v. White Marlin: Issues You Have Ignored

Daniel,

Also, I have talked to Nigel and we are willing to make him available for his fact deposition via zoom at your convenience.

Jeb Golinkin  
832-250-6567  
[jgolinkin@jlcfirm.com](mailto:jgolinkin@jlcfirm.com)

Sent from my iPhone

On Aug 19, 2024, at 4:51 PM, Schwank, Daniel <[DSchwank@frilot.com](mailto:DSchwank@frilot.com)> wrote:

Jeb,

We have added Couvillion's Motion to Quash these depositions as No. 4 to the joint letter. If you would like to address the same, please provide your revisions ASAP so we can proceed with filing.

Thanks,  
Daniel

<image002.jpg>  
**Daniel E. Schwank** (he/him)  
1100 Poydras Street, Suite 3700  
New Orleans, LA 70163  
504.599.8247 office  
504.599.8137 fax

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**From:** Jeb Golinkin <[jgolinkin@jlcfirm.com](mailto:jgolinkin@jlcfirm.com)>

**Sent:** Monday, August 19, 2024 4:39 PM

**To:** Schwank, Daniel <[DSchwank@frilot.com](mailto:DSchwank@frilot.com)>

**Cc:** Michael Cancienne <[mcancienne@jlcfirm.com](mailto:mcancienne@jlcfirm.com)>; Denny, Danica <[DDenny@frilot.com](mailto:DDenny@frilot.com)>;

Eason, Suzanne <[Season@frilot.com](mailto:Season@frilot.com)>

**Subject:** RE: Couvillion v. White Marlin: Issues You Have Ignored

Daniel,

These depositions have been noticed for a while. My right to depose your fact witnesses is completely unrelated to the dispute with respect to our dispute regarding your ability to re-depose our corporate representative.

I hope you will reconsider. If not, we will promptly seek relief from the Court.

Thanks,

Jeb

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**Joseph (“Jeb”) W. Golinkin II**

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1980 Post Oak Blvd., Suite 2300 Houston, Texas 77056

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<image003.png>

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**From:** Schwank, Daniel <[DSchwank@frilot.com](mailto:DSchwank@frilot.com)>

**Sent:** Monday, August 19, 2024 4:17 PM

**To:** Jeb Golinkin <[jgolinkin@jlcfirm.com](mailto:jgolinkin@jlcfirm.com)>

**Cc:** Michael Cancienne <[mcancienne@jlcfirm.com](mailto:mcancienne@jlcfirm.com)>; Denny, Danica <[DDenny@frilot.com](mailto:DDenny@frilot.com)>;

Eason, Suzanne <[Season@frilot.com](mailto:Season@frilot.com)>

**Subject:** RE: Couvillion v. White Marlin: Issues You Have Ignored

Hi Jeb,

Please see our comments below in red. Please also confirm that Defendants are withdrawing the notices of deposition for Jason Holvey and Mitch Dautreuil. As you are aware, we offered August 27 and August 28 for these depositions subject to the completion of Defendants’ corporate depositions, which we have yet to receive dates for.

Thanks,

Daniel

<image002.jpg>

**Daniel E. Schwank** (he/him)

1100 Poydras Street, Suite 3700

New Orleans, LA 70163

504.599.8247 office

504.599.8137 fax

**From:** Jeb Golinkin <[jgolinkin@jlcfirm.com](mailto:jgolinkin@jlcfirm.com)>  
**Sent:** Saturday, August 17, 2024 5:30 PM  
**To:** Schwank, Daniel <[DSchwank@frilot.com](mailto:DSchwank@frilot.com)>  
**Cc:** Michael Cancienne <[mcancienne@jlcfirm.com](mailto:mcancienne@jlcfirm.com)>; Denny, Danica <[DDenny@frilot.com](mailto:DDenny@frilot.com)>  
**Subject:** Couvillion v. White Marlin: Issues You Have Ignored

Daniel,

This is the second (an in some cases, third) time I am following up on these topics. By **EOB Monday**, please let me know if I need to go to the Court on these requests. **I need your documents properly produced no later than Friday.** If I do not hear from you, I will assume you are opposed and will prepare a letter.

1. Rogs: Please review Couvillion's answers to Interrogatory Nos. 3-5, 8-11, 12, 16, 17 and let me know whether Couvillion will provide more complete answers, or whether it intends to stand on its existing objections. **Couvillion maintains its responses and objections to the referenced interrogatories. Discovery is still ongoing. Defendants are well aware of the outstanding requests for documents and depositions. Couvillion will comply with its obligations, including its duty to supplement, as required by the Federal Rules of Civil Procedure.**
2. Production of Evidence in Usable Format: you have not produced your documents in a usable format. By EOB Monday, please confirm you will reproduce your documents as they were kept in the ordinary course of business. Please immediately re-produce Couvillion's document production consistent with the below rules, which (as you know) are standard in virtually every commercial case involving meaningful documents. **Couvillion produced documents in the same manner as Defendants. Please clarify if this request is in reference to any specific document so Couvillion can evaluate the same.**
3. 30(b)(6) Deposition: I've now asked for dates three times. Please provide dates or I will notice the deposition for a date and time of my choosing. **Defendants have consistently failed to provide Couvillion with dates for resuming Defendants' corporate depositions. We have also requested a new date for the deposition of Nigel Solida. Couvillion needs to finalize Defendants' corporate depositions prior to Defendants conducting the corporate deposition of Couvillion. Couvillion will provide a date for its corporate deposition as soon as Defendants offer a mutually agreeable date to complete the Defendants' corporate depositions.**

#### Instructions for Document Production

##### 1. File Format:

1. **PDF Files:** All documents should be produced in searchable PDF format. Ensure that the text within the PDFs is OCR'd (Optical Character Recognition) to allow for text searching and indexing.
2. **Native Files:** For documents that exist natively in electronic format (e.g., Word

documents, Excel spreadsheets, emails), produce these in their original native formats alongside the PDFs. Each native file should be accompanied by a corresponding PDF version.

**2. Metadata:**

1. Provide a metadata load file in .dat or .csv format, including the following fields:
  1. Bates Number
  2. Document Date
  3. Author
  4. Recipient
  5. CC (if applicable)
  6. BCC (if applicable)
  7. Document Type (e.g., email, memo, report)
  8. File Name (for native files)
  9. Custodian
  10. File Path
  11. Confidentiality Designation (if applicable)

**3. Load Files:**

1. Provide a load file compatible with standard litigation support software (e.g., Relativity, Concordance, Summation). The load file should link the metadata fields with the corresponding documents.

**4. Folder Structure:**

1. Organize the documents in a logical folder structure that mirrors the original file system or is organized by custodian or date range.

**5. Delivery:**

1. Provide the production electronically via secure file transfer, encrypted USB drive, or another agreed-upon secure method.
2. Include a detailed index or cover letter describing the production set and the total number of documents and pages produced.

Thanks,

Jeb

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**Joseph W. Golinkin II**

Trial Attorney | Jordan, Lynch & Cancienne PLLC

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<image003.png>

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<Aug letter to Judge (Final).docx>

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